

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

**MICHAEL COREY JENKINS,
EDDIE TERRELL PARKER**

PLAINTIFFS

v.

CAUSE NO. 3:23-cv-374-DPJ-ASH

**RANKIN COUNTY, MISSISSIPPI,
RANKIN CO. SHERIFF BRYAN BAILEY,
Individually, et al.**

DEFENDANTS

**MOTION FOR EXTENSION OF TIME TO FILE REPLY TO PLAINTIFFS' [146] RESPONSE
TO SHERIFF BAILEY'S [132] MOTION FOR SUMMARY JUDGMENT PREMISED ON
QUALIFIED IMMUNITY**

NOW COMES Defendant, Sheriff Bryan Bailey, by and through counsel, and moves this Court for an extension of time to file his Reply Brief in support of his [132] Motion by stating as follows:

1. Plaintiffs filed their [146] Response to Sheriff Bailey's [132] Motion for Summary Judgment Premised on Qualified Immunity on April 14, 2025. The pleading was followed by 600 plus pages of documents (docket entries [147] through [151]), some of which were filed on April 15, 2025, after counsel-opposite experienced technical difficulties.

2. Due to the number of documents at issue and the holiday weekend, Sheriff Bailey respectfully requests an extension of time through **Monday, April 28, 2025**, in which to file a Reply in support of his [132] Motion and/or other applicable pleadings related to Plaintiffs' [146] Response.

3. Pursuant to L.U. Civ. R. 7(b)(10), the undersigned counsel has inquired from Plaintiffs' counsel whether there will be any opposition to the instant motion but has not received a response.

4. The instant motion is filed in good faith and is not intended to delay these proceedings and/or harass any of the parties.

5. Due to the simplistic and straight-forward nature of the instant motion, Sheriff Bailey respectfully requests to be relieved of any obligation to file an accompanying memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Sheriff Bailey prays that this Court grant him an extension of time through Monday, April 28, 2025, in which to file a Reply in support of his [132] Motion and/or other applicable pleadings related to Plaintiffs' [146] Response.

RESPECTFULLY SUBMITTED, this 18th day of April, 2025.

**SHERIFF BRYAN BAILEY, IN HIS INDIVIDUAL
CAPACITY - DEFENDANT**

BY: /s/ Jason E. Dare
JASON E. DARE

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